

LAW OFFICE OF DANIEL MARKS
DANIEL MARKS, ESQ.
Nevada State Bar No. 002003
office@danielmarks.net
ADAM LEVINE, ESQ.
Nevada State Bar No. 004673
alevine@danielmarks.net
610 South Ninth Street
Las Vegas, Nevada 89101
(702) 386-0536: FAX (702) 386-6812
Email: office@danielmarks.net
Attorneys for Counter-Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CLARK COUNTY EDUCATION
ASSOCIATION,

Plaintiff,

v.

ALEXANDER ROCHE, an individual;

Defendant.

ALEXANDER ROCHE, an individual;

Counter Claimant

v.

CLARK COUNTY EDUCATION;
ASSOCIATION, a labor union and employer;
CLARK COUNTY STAFF ORGANIZATION, a
labor union; DOE BUSINESS ENTITIES 1-10;
JOHN VELLARDITA, Executive Director of
CCEA, an individual, in his individual and official
capacities,

Counter Defendants.

Case No.: 2:22-cv-00964-GMN-DJA

**STIPULATION TO CONTINUE HEARING
ON MOTION TO DISMISS COUNSEL**

STIPULATION TO CONTINUE HEARING ON MOTION TO DISMISS COUNSEL

Plaintiff/Counter-Defendants CLARK COUNTY EDUCATION, ASSOCIATION (“CCEA”), CLARK COUNTY STAFF ORGANIZATION (“CCSO”), and JOHN VELLARDITA “(Vellardita”) (Collectively referred to herein as “Counter-Defendants”) by and through their attorneys of record, Adam Levine, Esq. and Daniel Marks, Esq. of the Law Office of Daniel Marks and Defendant/Counter-Claimant, ALEXANDER ROCHE (“Roche”) by and through his counsel, ROBERT S. MELCIC, ESQ., hereby stipulate that this Court continue the hearing on the Motion to Dismiss Counsel [ECF 8], “erroneously entitled in the Minute Order of December 9, 2022 as: ‘Re: [8] Motion for Appointment of Counsel,’” set for hearing on December 19, 2022 be continued to a later date due to a conflict in Defendants/Counter-Defendants’ counsel Adam Levine, Esq.’s calendar. Attorney Levine already has a calendar call scheduled in the *Westco Trucking v. FTD*, District Court Case No: A-20-808682-C case at 10:00 a.m., and an all-day Fact Finding Arbitration between Clark County Defenders Union and Clark County scheduled to start at 10:30 a.m. on December 19, 2022.

The parties hereto have agreed to stipulate to continue the hearing on the Motion to Dismiss Counsel to a later date and time that is convenient for this Court.

DATED this ____ day of December, 2022.

LAW OFFICE OF DANIEL MARKS

/s/Adam Levine, Esq.

ADAM LEVINE, ESQ.

Nevada State Bar No. 004673

610 South Ninth Street

Las Vegas, Nevada 89101

Email: office@danielmarks.net

Attorneys for Counter-Defendants

Clark County Education Association, Clark

County Staff Organization and John Vellardita

/s/Robert S. Melcic, Esq.

ROBERT S. MELCIC, ESQ.

Nevada Bar No.: 14923

3315 E. Russell Road, Suite A4-271

Las Vegas, Nevada 89120

Tel: (702) 526-4235

Clerk: (702)725) 577-8013

Email: robertmelcic@gmail.com

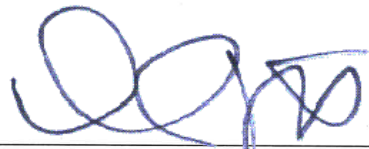
Attorney for Defendant/Counter-Claimant

Alexander Roche

Clark County Education Association, v. Alexander Roche, et. al.
U.S. District Court Case No.: 2:22-cv-00964-GMN-DJA
STIPULATION TO CONTINUE HEARING ON
MOTION TO DISMISS COUNSEL

IT IS SO ORDERED. The hearing on the motion to dismiss counsel is
RESCHEDULED to Thursday, January 5, 2023 at 1:30 p.m. in Courtroom 3A.

DATED this 16th day of December 2022.



United States Magistrate Judge

Joi Harper

From: Law Clerk <rsmlawclerk@gmail.com>
Sent: Tuesday, December 13, 2022 12:28 PM
To: Joi Harper
Cc: Robert Melcic; Adam Levine; Steve Sorensen
Subject: Re: FW: Clark County Education Association v Alexander Roche - Case No. 22-cv-00964-GMN-DJA

Good afternoon, Ms. Harper,

I apologize for the delay. In future, please be sure to carbon copy me on the first e-mail so that your concern will be more quickly addressed as I manage Mr. Melcic's calendar. We are also trying to phase out use of his personal cell phone for initial work-related calls. The office phone where I can be reached is 725.577.8013.

Having said that, Mr. Melcic consents to this stipulation and you may affix his signature.

Thank you,
Ms. Generaux
Law Clerk
Robert S. Melcic, Esq.
rsmlawclerk@gmail.com
725.577.8013